

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

**MAIL PROCESSING NETWORK RATIONALIZATION  
SERVICE CHANGES, 2012**

DOCKET No. N2012-1

**UNITED STATES POSTAL SERVICE NOTICE OF FILING ERRATA TO  
RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS NERI TO  
GREETING CARD ASSOCIATION INTERROGATORIES  
(GCA/USPS-T4-17(a)(iv))  
(March 7, 2012)**

The Postal Service hereby files errata to the Response of United States Postal Service Witness Neri to Greeting Card Association Interrogatory GCA/USPS-T4-17(a)(iv), which was filed on March 2, 2012. The response contained an error, which has been corrected in the attachment to this filing. The correction is shown in gray highlighted text.

Respectfully submitted,

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March 7, 2012

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS NERI  
TO GREETING CARD ASSOCIATION INTERROGATORIES

**GCA/USPS-T4-17**

In your response to GCA/USPS-T4-1, the question referenced "declining volume in First Class Mail", and your answer to part (a) was that "up until 2006, volumes were growing."

(a) For each of (i) through (iv), below, please state the year in which the category of mail peaked:

(i) Total First-Class Mail;

(ii) Total First-Class Letter Mail;

(iii) Single-Piece First-Class Letter Mail;

(iv) Workshared First-Class Letter Mail.

(b) For each of (a)(i) through (a)(iv), please state the source of the data on which you rely to identify the peak year.

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(e) Please refer to your answer in GCA/USPS-T4-1(a), referring to the use of excess capacity to "accommodate the volume growth." Was the volume growth that you refer to growth in worksharing First-Class Letter Mail alone? If your answer is not an unqualified "yes," please explain fully.

(f) If your answer to (e) was affirmative in any degree, please explain (i) whether the Postal Service was adding further capacity, up to 2006-2007, when worksharing activity for all upstream processing was increasing (presumptively displacing the Postal Service's need to add capacity), and (ii) if so, why.

(g) If your answer to (e) was negative, please state what other categories of First-Class Mail besides workshared were growing in volume until 2006-2007.

**RESPONSE:**

(a) (i) FY 2001 (103.7 billion pieces)

(ii) I am not aware of any isolation of this data in postal data systems. First-Class Mail Letters, Flats, and Parcels (excluding Cards) peaked in FY 2001 at 98.2 billion pieces.

(iii) I am not aware of any isolation of this data in postal data systems. Single-piece First-Class Mail Letters, Flats, and Parcels (excluding Cards) peaked in FY 1990 at 56.8 billion pieces.

(iv) Workshared First-Class Mail Letters peaked in Fiscal Year 2007 at 49.05 billion pieces.